OWENS CORNING
PMB 172
2280 GRASS VALLEY HWY.
AUBURN, CA 95603
530.885.7558 FAX 530.885.7331
e-mail: david.w.ware@owenscorning.com

DAVID W. WARE
MANAGER, CODES & REGULATION
WESTERN REGION

August 23, 2002

Commissioner Robert Pernell
Commissioner Art Rosenfeld
Energy Efficiency Committee

Bill Pennington

California Energy Commission
1516 Ninth Street
Sacramento, Ca 95814-5512

RE: COMMENTS ON 2005 BUILDING ENERGY EFFICIENCY STANDARDS; APRIL 23RD & July 18th STAFF WORKSHOPS; FIRST & THIRD GROUP OF MEASURE REPORTS—*CONSTRUCTION QUALITY-WALLS & ATTICS*

Dear Commissioners and Bill Pennington:

This letter follows upon my previous letter of April 22nd expressing our strong opposition to staff's proposed reductions to the installed R-value of walls. In that letter I summarized six major concerns with staff's proposal. Since that time there has been several discussions with staff and their consultants regarding the perceived poor quality of installed insulation systems (walls and ceilings) and we continue to maintain our opposition to the lack of statistical data supporting the staff proposal and the inappropriate manner staff is using in its endeavor to promote high performance buildings.

Staff's premise for the proposed reductions in installed R-value rests solely on the results of earlier Davis Energy Group (DEG) consultant work.[1] In the consultant report prepared for the April 23rd (wall insulation) and July 18th (attic insulation) workshops, only 10 houses were used to base the proposed R-value reduction upon. Several glaring inconsistencies with statements in these reports make it impossible to arrive at the same conclusions as staff apparently has:

- 5 of the 10 houses reported in the April 23rd consultant report for wall insulation were "high quality" jobs, yet <u>were not included</u> in averaging the results of reduced R-value effectiveness due to installation[2]

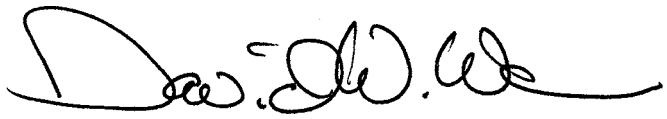
[1] Residential Construction Quality Assessment Project, Phase II Final Report; Davis Energy Group, March 31, 2002; Contract #400-98-004.
[2] Part I, Measure Analysis and Life-Cycle Cost; April 11, 2002

- Of the 10 homes reported in the July 18th consultant report for ceiling insulation the primary reported performance problem was poor draft stopping or the lack of adequate air barrier protection, yet the proposed calculation method degrades the effective installed R-value as opposed to imposing a new calculation to address potential air leakage aspects for the integrity of the ceiling air barrier system[3]

I support the concept of rewarding high performance building practices. But it's inappropriate to single out one segment of the construction industry for poor quality based upon so few documented homes—homes that should have been identified and remedied during the building official site inspection process.

To illustrate to you that our industry does and can indeed install to a higher level of performance than reported in staff's analysis I will be forwarding on to your staff photos of newly installed wall and ceiling insulation from around the state. I trust you will view these photos in the same objective and critical fashion as those reported by staff.

Sincerely,



David W. Ware
Manager, Codes & Regulation
Western Region

[3] Part III, Measure Analysis and Life-Cycle Cost, July 3, 2002